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9 Attorneys for Defendants KAISER FOUNDATION HOSPITALS,
10 GEORGE HALVORSON, BETTIE COLES, RICHARD SIMMS,
11 PATRICIA HERNANDEZ, BRENDA ROBERTSON
12 (erroneously sued as Brenda "Robinson"),
13 EARLENE PERSON, and YOLANDA CHAVEZ

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 MARCELLA TRAN,
18
19 Plaintiff,

20 vs.

21 GEORGE HALVORSON, CEO/CHAIRMAN,
22 KAISER FOUNDATION HOSPITALS,
23 BETTIE COLES, RICHARD SIMMS;
24 PATRICIA HERNANDEZ; BRENDA
25 ROBINSON, MILTON AQUINO; EARLENE
26 PERSON, YOLANDA CHAVEZ; SAL
27 CURSIO and DOES 1 through 20, Inclusive,
28

Defendants.

) USDC Case No. C 07 4384 PJH

) STIPULATION TO DISMISS
) INDIVIDUAL DEFENDANTS GEORGE
) HALVORSON, BETTIE COLES,
) RICHARD SIMMS, PATRICIA
) HERNANDEZ, BRENDA ROBERTSON
) EARLENE PERSON, AND YOLANDA
) CHAVEZ WITHOUT PREJUDICE;
) AND (PROPOSED) ORDER

STIPULATION AND [PROPOSED] ORDER DISMISSING INDIVIDUAL DEFENDANTS,
WITHOUT PREJUDICE / CASE NO. C 07-4384 PJH

1 The parties hereby agree and stipulate to dismiss, without prejudice, the following
2 individual defendants from this action: GEORGE HALVORSON, BETTIE COLES, RICHARD
3 SIMMS, PATRICIA HERNANDEZ, BRENDA ROBERTSON, EARLENE PERSON, and
4 YOLANDA CHAVEZ.

5 The parties further agree and stipulate that Defendant KAISER FOUNDATION
6 HOSPITALS will not seek from plaintiff and her counsel attorneys' fees and/or costs associated
7 in any respect with the stipulated dismissal of these individual defendants.
8

9 DATED: September 10, 2007

LAW OFFICES OF CHARLES J. KATZ

By 

Charles J. Katz

Attorneys for Plaintiff MARCELLA TRAN

13 DATED: September 10, 2007

SEYFARTH SHAW LLP

By 

Dana L. Peterson
Andrew M. McNaught

Attorneys for Defendants KAISER
FOUNDATION HOSPITALS, GEORGE
HALVORSON, BETTIE COLES, RICHARD
SIMMS, PATRICIA HERNANDEZ, BRENDA
ROBERTSON, EARLENE PERSON, and
YOLANDA CHAVEZ

21 IT IS SO ORDERED.

ORDER

23 DATED: _____, 2007

By _____

PHYLLIS J. HAMILTON
United States District Court Judge

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STIPULATION AND [PROPOSED] ORDER TO DISMISSING INDIVIDUAL DEFENDANTS,
WITHOUT PREJUDICE / CASE NO. C 07-4384 PJH